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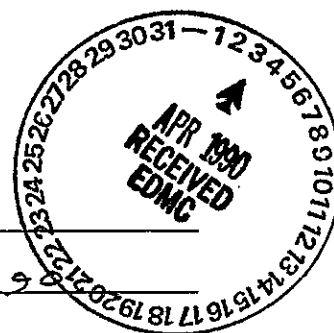
March 19, 1990

Meeting Minutes Transmittal/Approval

Special Topic: Work Plan Integration

450 Hills Street, Room 47

February 14, 1990



From/ Appvl. Robert K. Stewart Date: 3/21/90  
Robert K. Stewart, Unit Manager, DOE-RL (A6-95)  
Appvl.: Paul T. Day Date: 3/21/90  
Paul T. Day, Unit Manager, EPA (A7-70)  
Appvl.: Larry Goldstein Date: 3/21/90  
Larry Goldstein, Unit Manager, Washington Department of Ecology

To: Distribution:

P.T. Day, EPA (A7-70)  
D.R. Sherwood, EPA (A7-70)  
D.R. Einan, EPA (A7-70)  
L. Goldstein, Ecology  
C. Cline, Ecology  
K.M. Thompson, DOE (A6-95)  
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R. Pressentin, DOE (A6-95)  
R.K. Stewart, DOE (A6-95)  
S.H. Wisness, DOE (A6-95)  
R.D. Freeberg, DOE (A6-95)  
W. Staubitz, USGS  
D.A. Myers, GSSC (A4-35)  
J.R. Chiaramonte, GSSC (A4-35)  
Administrative Record File (100-HR-1, 100-HR-3, 100-DR-1, 100-BC-1, 100-BC-5, 300-FF-1, 300-FF-5) [Care of Susan Wray, WHC]  
T. Wintczak, WHC (B2-15)  
F.V. Roeck, WHC (H4-55)  
A.D. Krug, WHC (H4-55)  
W. Johnson, WHC (H4-55)  
M. Lauterbach, WHC (H4-55)  
J. Patterson, WHC (B2-15)  
L.L. Ames, PNL (P7-50)  
M. Hagood, WHC (H4-56)  
S. Weiss, WHC (H4-55)  
R. Carlson, WHC (H4-55)  
S. Clark, WHC (H4-55)  
D. Lacombe, PRC  
M.R. Adams, WHC (H4-55)

This meeting was a followup to the previous Special Topics meeting held on January 18, 1990. The purpose of this meeting was to discuss the specific application of the Ecology proposed approach to source/groundwater work plan integration to specific sets of work plans with a focus on the 100-H and 100-D areas.

Meeting minutes are comprised of the following:

Attachment 1 - Meeting Summary/Summary of Commitments and Agreements  
Attachment 2 - Attendance List  
Attachment 3 - WHC's summary of the January 17, 1990 letter from Larry Goldstein, Ecology, to John Broderick, USDOE, "Ecology/EPA Position Paper on Operable Unit Work Plan Integration".

March 19, 1990

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450 Hills Street, Room 47, Richland Washington  
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From: J. D. Goodenough (A6-95)

To: Distribution:

P.T. Day, EPA (A7-70)	T. Wintczak, WHC (B2-15)
D.R. Sherwood, EPA (A7-70)	F.V. Roeck, WHC (H4-55)
D.R. Einan, EPA (A7-70)	A.D. Krug, WHC (H4-55)
L. Goldstein, Ecology	W. Johnson, WHC (H4-55)
C. Cline, Ecology	M. Lauterbach, WHC (H4-55)
K.M. Thompson, DOE (A6-95)	J. Patterson, WHC (B2-15)
R.K. Stewart, DOE (A6-95)	S. Weiss, WHC (H4-55)
S.H. Wisness, DOE (A6-95)	R. Carlson, WHC (H4-55)
R.D. Freeberg, DOE (A6-95)	S. Clark, WHC (H4-55)
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Administrative Record File (100-HR-1, 100-HR-3, 100-DR-1, 100-BC-1, 100-BC-5, 300-FF-1, 300-FF-5) [Care of Susan Wray, WHC]	

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Attachment 1

Meeting Summary/Summary of Commitments and Agreements  
Special Topic: Work Plan Integration  
450 Hills Street, Room 47, Richland Washington  
February 14, 1990

1. General Strategy - Site investigations involving multiple source OUs within an aggregate groundwater OU should focus on the groundwater OU to provide data necessary to assess near term risk. Long term risk is to be assessed from data obtained in source OUs. Thus, the groundwater OU would be used to evaluate imminent endangerment for the aggregate area covered by groundwater OU. The investigations would:
  1. Address the primary source OU and groundwater OU concurrently
  2. Address in the groundwater OU:
    - Phase 1
      - a. Determine local and regional groundwater flow system
      - b. Investigate the most probable contributors to imminent endangerment (liquid disposal and "bad actor" solid waste sites)
      - c. Fill in the gaps in the data base describing the basic flow system
    - Phase 2
      - a. Perform subsequent assessment of identified contributors ("bad actors"); those sources posing imminent endangerment would be candidates for interim remedial actions; the remaining sources would be addressed in subsequent source OU investigations
      - b. Refine groundwater data for risk assessment
  3. At completion of groundwater OU phase 1, other source OUs within the aggregate groundwater OU would be evaluated for upgrading their investigation priority. This might include combining two or more operable units into a single work plan.
  4. Individual waste sites having contamination that poses imminent endangerment would be candidates for cleanup via interim remedial actions. Such actions would not constitute an emergency response, but rather only expedited response to be conducted within a 2-2 1/2 year time frame.

Agreement: As a goal, all of the OUs, both source and groundwater, within the groundwater OU aggregate area would be subject to a single ROD.

Action # ST6.1: DOE/WHC is to develop a strategy document which provides the details concerning integration of source and groundwater operable units. This strategy is to be based on the Feb. 14 Special Topics meeting and correspondence on the subject between Ecology and DOE.  
Action: Mike Thompson by 3/2/90.

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Agreement: The TPA Milestone 13 would remain as written, but its intent would be achieved if operable unit work plans are combined. That is, each OU addressed counts as a delivered plan, even if OU plans are combined.

2. TSD vs. RCRA Past Practice - An issue was discussed regarding investigation of the NR area under TSD or under RCRA Past Practice authority [3004(u)].

Agreement: The NR work plans will be written in the same manner as HR-1, HR-3, and DR-1, i.e., RCRA Past Practice; Ecology programmatic comments will be incorporated during one of the review periods.

Action # ST6.2: DOE/WHC will meet internally to define a strategy for resolution of the TSD vs. RCRA Past Practice issue. A position paper will be developed and submitted to the regulatory agencies. Action: Merl Lauterbach

3. An issue was discussed regarding appropriate guidance for use in preparation of the RCRA Past Practice work plans, starting with the NR plans.

Agreement: The work plan guidance document will be written to provide a single direction for all future work plans, both RPP and CPP.

4. The impact of the new strategy on 300 Area work plans was discussed. It was agreed that the 300-FF-5 work plan would not be revised at this time. An addendum could be issued at a later date, if necessary.

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Attachment 2

Attendance List  
Special Topic: Work Plan Integration  
450 Hills Street, Room 47, Richland Washington  
February 14, 1990

NAME	ORGANIZATION	PHONE
D.A. Myers	GSSC/IT	376-0969
A.D. Krug	WHC	376-5634
D.R. Einan *	EPA	376-3883
D.R. Sherwood	EPA	376-9529
L. Goldstein	Ecology	(206) 438-7018
C. Cline	Ecology	(206) 438-7556
T. Wintczak *	WHC	376-0902
J. Broderick	DOE	376-4197
R. Stewart	DOE	376-6192
W. Johnson	WHC	376-1721
M. Lauterbach	WHC	376-5257
J. Patterson *	WHC	376-0568
W. Staubitz	USGS	(206) 593-6510
K.M. Thompson	DOE	376-6421
J.D. Goodenough	DOE	376-7087
G. Ballentine	PRC	(415) 543-4880
R. Pressentin	DOE	376-5983
L. Ames	PNL	376-2242
M. Hagood	WHC	376-9664
M.R. Adams *	WHC	376-8361
S. Weiss	WHC	376-1683
J. Chiaramonte	GSSC/IT	376-7829

\* Part-time

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### Attachment #3

The draft Ecology/EPA Position Paper on Operable Unit Work Plan Integration presents a strategy for integrating the source and groundwater operable unit workplans and the associated characterization activities. We interpret the strategy to be as follows:

1. Treat each groundwater unit and its associated source and solid waste units as a mini-aggregate area (groundwater aggregate area). In the long run, realign the boundaries of the units to create fewer units within this groundwater aggregate area. In the short run, modify the existing workplans so that they reflect this strategy and make each a stand alone document.
2. Reprioritize the Hanford Federal Facility Agreement and Consent Order (Agreement) milestones and operable unit priority list to accomplish this.
3. Prioritize the characterization work (over the groundwater aggregate area) so that the initial focus is upon defining any interim corrective measures necessary to abate environmental or public health threats. Establish the parameters and criteria which are to be used to define environmental or public health threats. Next, provide the data and data analysis required to define critical environmental pathways and to perform an initial risk assessment. Finally do a more complete gathering of data to support a management decision regarding the most appropriate, timely and cost effective actions to clean up releases of hazardous constituents.

This prioritization, in effect, creates a phased approach in the RFI/CMS activity. Phase I is a "survey" approach, gathering data over the entire groundwater aggregate area and focusing on near term goals. It emphasizes using existing near-source groundwater wells and identification and sampling of groundwater discharge locations, e. g. river bank springs. Subsequently, surface water, sediment, and biota sampling efforts would be performed at identified discharge locations. If contaminants are apparent in a certain area then either interim corrective measures are taken or Phase II is initiated. Phase II is a more complete and focused data gathering based upon potential points for maximum exposure developed during Phase I.

4. Integrate the management of risk assessments for source and groundwater operable units to include:
  - sources potentially contaminating media within source and groundwater operable units;
  - source operable unit investigations that evaluate existing and imminent risk from surface and near-surface media;
  - groundwater operable unit investigation that evaluate the existing and imminent risk from groundwater contamination and the environmental pathways to receptors from source operable units.
5. Restructure the distribution of work between the groundwater, source and solid waste units so that:
  - a. The groundwater unit plan complements the source investigations by providing regional (groundwater aggregate area) data and facilitates regional (groundwater aggregate area) performance

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assessments.

- b. The groundwater unit plan serves as the master plan, in that it describes the scope of all characterization activity in all the affected operable units (including those not yet underway). Each operable unit workplan would, however, be a stand alone document for the work conducted within that unit. Groundwater characterization for each unit would be removed from the groundwater unit plan and put in the respective source or solid waste unit plans. The characterization activity remaining in the groundwater unit plan would be for the 600 Area (e.g., all land not within the D and H Areas but in 100-HR-3).
5. Prepare an integrated schedule and spending plan for all the units within a groundwater aggregate area and manage the work as one unit.

The proposed strategy has merit and would enhance the environmental restoration activities in that:

- risk assessment (and corrective measures) on a groundwater aggregate area can be implemented at an earlier point in time;
- cost and schedule savings could be realized by integrating the RFI/CMS activities and by producing fewer documents. Reports could, for example cover the entire groundwater aggregate area.

In order to fully implement this strategy some clarifications and refinements need to be made.

1. This strategy, in the short term (e.g., for the 100-HR-3 groundwater aggregate area), would require advancing the schedule on 100-DR-2, -3 and 100-HR-2 or extending the schedule for 100-HR-1, 3 and 100-DR-1. Interim corrective measures could be implemented but a full resolution for the area would not be possible until all the RFI/CMSs were completed. This seems inconsistent with current concerns about establishing short RFI/CMS schedules.
2. This strategy seems to anticipate the need to conduct some of the work as interim corrective measures. A consensus needs to be reached as to what constitutes an environmental or public health threat. It is also imperative to recognize the impact of interim measures on the overall schedule and the reallocation of funds.
3. A "strategy" needs to be developed for each groundwater aggregate area which addresses integration, consistent investigative approaches, scope of work and investigation goals. These should be prepared prior to workplan preparation for each of the areas and agreed to by WHC/DOE/EPA/ECOLGY as the basis for that area. Would it be more appropriate to develop strategies for the 100, 200 and 300 Areas?
4. To effectively conduct the Phase I survey activity, heavy reliance may have to be made upon existing Hanford data and existing groundwater wells. Is this consistent with contamination in ground water?.
5. This strategy lends itself to producing groundwater aggregate area

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documents since the work will be closely integrated. Would this be acceptable to EPA/ECOLOGY in lieu of individual documents for each unit?

8. This strategy essentially requires full integration between the RCRA TSD activities and the RFI/CMS activities. The mechanism to accomplish does not seem to be in place. Additionally, such a linkage introduces a new set of concerns (e.g., should all RCRA TSD samples be analyzed using CLPs?).

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